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Prepped by Ollie Stewart

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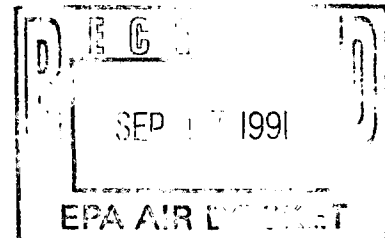
IV-D-04

V. G. Beghini
PresidentRECEIVED
9/14/91**Marathon
Oil Company**P.O. Box 3128
Houston, Texas 77253
Telephone 713/629-6600

Dave

September 3, 1991

Mr. William K. Reilly, Administrator
U.S. Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460



Dear Mr. Reilly:

Re: Docket A-91-46

Marathon would like to express its strong support for Ethyl Corporation's waiver application for HiTEC 3000 and to urge EPA to grant the waiver in a timely manner.

As you know, the Clean Air Act places a number of difficult and costly demands on refiners to comply with reformulated gasoline requirements. Moreover, EPA's data shows that one of the requirements - the addition of oxygenates - can cause an increase in NO_x emissions. After 1997, when the complex model takes effect, Marathon expects that further and possibly very expensive changes in gasoline composition will be required to offset oxygenate related NO_x increases.

The emissions data for HiTEC 3000 shows that this additive is effective in reducing NO_x emissions. Our evaluation suggests it may well be the most cost efficient means available to achieving this Clean Air Act goal.

In addition, HiTEC 3000 offers refiners a means to maintain octane levels by substituting for octane lost by aromatics reductions needed to comply with toxics standards. In this way, it will help us meet another important Clean Air Act goal.

We urge that the timely approval be granted so that the extensive body of emissions data which Ethyl, EPA and other independent laboratories have accumulated can be used to provide a HiTEC 3000 term in the complex model when it issues in November, 1992.

Marathon appreciates the opportunity to express our support as well as EPA's consideration of our comments.

Yours truly,

A handwritten signature in dark ink, appearing to read "V. G. Beghini".

VGB/cas

bcc: J. L. Frank, Executive Vice President, Marathon Oil Company
R. K. McCord, Vice President, Marathon Oil Company

B. C. Gottwald, President, Ethyl Corporation

Ms. Mary T. Smith, Director ✓
Field Operations and Support Division
(EN-397F), U.S. EPA
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Washington, DC 20460